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MISSISSIPPI GAMING COMMISSION  
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November 29, 2004

Nation Indian Gaming Commission  
Philip N. Hogen, Chairman  
1447 L St. NW, Suite 9100  
Washington, DC 20005

Re: Comments to Proposed Class II Game Classification and Technical Standards

Dear Chairman Hogen:

I have reviewed the proposed standards regarding the classification of Class II games and the associated technical standards and offer the following response and enclosures. The Mississippi Gaming Commission currently allows both traditional Bingo and Pull-tabs to be played in the State. The Mississippi Charitable Gaming Laws and Regulations, of which I have included a copy, regulate this type of Gaming. The Mississippi Gaming Control Act regulates class III Gaming with the exception of Class III Tribal Gaming. Currently, Mississippi does not have anyone operating under what would be considered by The National Indian Gaming Commission (N.I.G.C.) as Class II.

The significant difference in Mississippi's Bingo Regulation and the proposed Class II standards is the electronic medium and computer assistance. Mississippi does not require a tangible medium for Bingo Paper or Pull-tabs that may be played in the electronic medium. In the event that Mississippi did have Class II Tribal Gaming, the N.I.G.C.'s proposed standards would not allow the same types of Bingo games that are currently allowed through Charitable Gaming Regulation in Mississippi.

I hope these comments offer some assistance in the N.I.G.C.'s goals for clarifying Class II gaming. If I can be of further assistance, please feel free to contact myself at (601) 351-3800 or the Charitable Gaming Director at (601) 576-3850.

Sincerely,

  
Larry Gregory  
Executive Director

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This figure is to be compared to the win/loss as determined from the machine meter readings. Any significant differences must be investigated and documented on the daily report by the designated supervisor.

Section 11. The keys to open the locked doors to the electronic pull-tab device's coin and/or cash box must be maintained by the bingo supervisor, alternate supervisor or a worker whose duty is not cashier, money count, or the person who pays prizes to the participants.

[Authority: 97-33-53(a, iv), 97-33-109(f), 97-33-71.]

Section 12. No licensee shall allow any person under eighteen (18) years of age to play any electronic or manual pull-tab device.

#### S. VIDEO BINGO AND VIDEO FINITE PULL-TAB MACHINE SPECIFICATIONS.

Section 1. Prior to approval for use in the state, each video bingo machine must meet the following specifications with respect to its operation:

- (a) Must use a random selection process to determine the game outcome of each play of a game. The random selection process must meet 99 percent (99%) confidence limits using a standard chi-squared test for goodness of fit; and any other generally accepted mathematical tests for randomness as authorized by the Commission.
- (b) For bingo machines the field of numbers shall be mixed after each game by using a random number generator;
- (c) For bingo machines a field of numbers from 1 to 75 shall be utilized;
- (d) For bingo games after the field of numbers has been mixed and before the start of the game, the field of numbers is to be frozen with all numbers used for play taken in order from the top of the frozen field;
- (e) For bingo games when only one bingo card is displayed, the machine may allow the player the option of manually selecting the numbers on the card. In all other cases, the bingo cards shall be generated by the random number generator and no two cards during one game may be identical;
- (f) Payout shall be not less than eighty percent (80%) and not more than ninety-three percent (93%);
- (g) The maximum prize awarded shall not exceed one thousand dollars (\$1,000.00) per game;
- (h) The machine shall not dispense cash;
- (i) One credit shall equal twenty-five cents (\$.25) in value;
- (j) The maximum allowable bet shall not exceed one dollar (\$1.00) per game;
- (k) The machine may have two electronic coin mechanisms that accept coins. Mechanical coin acceptors are prohibited;
- (l) The machine may have a mechanism that accepts cash in the form of bills that do not exceed twenty dollars (\$20.00).
- (m) The game pay-table shall be prominently displayed and understandable to the

player. The pay-table for each subsequent coin bet must be greater than or equal to the percentage of the previous coin;

- (n) The game of play shall conform to standard rules of bingo;
- (o) In bingo games each card shall contain twenty-four (24) numbered spaces per card and one (1) free spot;
- (p) In bingo games the machine shall designate the winning arrangement of numbers prior to commencing play;
- (q) In bingo games the player shall have a choice of cards on which to play;
- (r) In bingo games all winning cards shall be available for display on the screen, including any that may be played by the machine in any game;
- (s) In bingo games the machine shall display the number of balls picked and the credits awarded for the number of balls drawn in order to obtain a bingo;
- (t) In video bingo games, each game shall continue until such time a bingo is produced or the player no longer has a chance to win;
- (u) The machine shall pass a static test performed by the Commission or its designee using currently acceptable test criteria;

Section 2. Prior to approval for use in the state, each video pull-tab machine must meet the following specifications with respect to its operation:

- (a) It shall only offer the game of video finite pull-tabs and video bingo (as set forth in this Regulation);
- (b) Each "deal" that is visible to the player shall be represented internally in the device as four separate and distinct finite "sub-deals" all identical in the number of tabs, the number of winners and losers and the number of winning tabs for each pay tier. After accepting money or bills from the player, the player shall press a button on the console or on the screen (in the case of a touch screen device) which shall signal to the device that the player is requesting a pull-tab. At this point the device shall choose a random number between 1 and 4 to signify which "sub-deal" the pull-tab will be pulled from. Subsequently, the device shall also choose a random number to determine which tab shall be displayed to the player. If the tab selected has been previously drawn out of that "sub-deal" the device shall choose another tab in an approved manner until one is obtained that has not been previously drawn.
- (c) A "sub-deal" shall not be reconstructed at any time until all of the tabs in the "sub-deal" have been previously pulled out. At which point, the finite device shall regenerate the "sub-deal" to match its original state. The terminal shall not be capable of indicating to the player, operator, distributor, or manufacturer that such "sub-deal" has been regenerated;
- (d) The maximum number of tabs per "sub-deal" shall be not less than 4,000 and no more than 20,000 tabs. The finite pull-tab game shall display either on-screen or on accompanying glass, all winning combinations and the payout awarded for achieving such payout. However, the game shall not display in any manner, the number of tabs of each finite category that have the ability to be picked or how many tabs remain;
- (e) Each device must use a random selection process to determine the game outcome of each play of a game. The random selection process must meet 99 percent

(99%) confidence limits using a standard chi-squared test for goodness of fit; and any other generally accepted mathematical tests for randomness as authorized by the Commission.

(f) Payout shall be not less than eighty percent (80%) and not more than ninety-three percent (93%);

(g) The maximum tab win amount awarded shall not exceed one thousand dollars (\$1,000.00) per game;

(h) The machine shall not dispense cash;

(i) One credit shall equal twenty-five cents (\$.25) in value;

(j) The maximum allowable bet shall not exceed one dollar (\$1.00) per game;

(k) The machine may have two electronic coin mechanisms that accept coins.

Mechanical coin acceptors are prohibited;

(l) The machine may have a mechanism that accepts cash in the form of bills that do not exceed twenty dollars (\$20.00);

(m) The game payable shall be prominently displayed and understandable to the player. The payable for each subsequent coin bet must be greater than or equal to the percentage of the previous coin;

(n) The machine shall pass a static test performed by the Commission or its designee using currently acceptable test criteria;

(o) Nothing herein shall limit the ability for manufacturers to implement a finite pull-tab game on a network topology where multiple player-activated terminals choose pull-tabs from a central finite pool. If such network topology has more than three active games, the manufacturer may choose to implement such finite pool as described elsewhere in this section, or have the option to play from one finite pool of tabs which may not be less than 8,000 nor more than 40,000;

(p) Any finite video pull-tab device shall not offer visual animation that simulates or displays rolling or spinning reels.

Section 3. Prior to approval for use in the state, each electronic video bingo or video finite pull-tab machine must meet the following specifications with respect to its hardware:

(a) All electrical and mechanical parts and design principles shall follow acceptable codes and standards in both design and manufacture;

(b) The machine shall be designed to ensure that the player will not be subjected to any unreasonable physical, electrical or mechanical hazard;

(c) The machine shall be designed to ensure there are no readily accessible game function-related points which would allow any input and that there is no access to input or output circuits unless it is necessary for the proper operation of the game;

(d) The machine shall be equipped with a surge protector that will feed all AC electrical current to the machine and a nonvolatile memory to maintain the accuracy of all electronic meters displaying information required by these rules during power fluctuations and loss. Each machine must maintain accuracy of all electronic meters and critical game information for 180 days after the power is disconnected from the machine;

(e) The machine shall not have any switches, jumpers, wire posts, or other means of manipulation that could affect the operation or outcome of a game. The machine

may not have any functions or parameters adjustable by and through any separate video display or input codes except for the adjustment of features that are wholly cosmetic or other operational parameters as approved by the division. This is to include devices known as "knockoff switches";

(f) Each machine shall have a lock external front door in which the interior of the machine shall not be readily accessible when such door is in the closed, locked position. In addition, each machine shall have a separate internal locked logic compartment which shall be keyed differently than the front door access lock. Each machine shall have one or more locked cash compartments; that is all areas which store either coin or currency prior to collection.

(g) The ticket printing mechanism shall be located behind the locked front door of the machine to ensure the safekeeping of the audit copy;

(h) Printing of all totals from the electronic meters shall occur automatically by means of a switch attached to either the door or the lock of the door each time access to either the main door or the cash area occurs;

(i) The printing mechanism of the electronic device shall have a paper-sensing device that will prevent play if there is no longer any paper in the printer or, in the alternative, if there is insufficient paper to print a ticket voucher or an audit copy. In the case that the machine senses "paper out", it shall void the previous cash ticket and print another recovery.

(j) The machine shall print a ticket voucher when requested by the player if there are any remaining credits on the game. The original ticket voucher and the duplicate audit copy must remain legible for five (5) years. The minimum information printed on the ticket voucher shall consist of the following:

- (1) The name of the licensed establishment;
- (2) The serial number of the machine;
- (3) The time of day that the ticket was printed in hours and minutes in a 24 hour format;
- (4) The date on which the ticket was printed;
- (5) The sequential number of the ticket voucher;
- (6) The value of the prize.

(k) The logic board shall have a legible, unique serial number that is stamped in permanent ink or engraved;

(l) The face of each machine shall be clearly labeled so as to inform the public that no one under age 18 years is allowed to play;

(m) The machine shall have a non-removable identification tag affixed by the manufacturer to the machine's exterior side. The tag information must include the following:

- (1) Manufacturer's name;
- (2) Serial number;
- (3) Model;
- (4) Date of manufacture;
- (5) Any other information required by the Commission.

Section 4. Prior to approval for use in the state, each machine must meet the following specifications with respect to its metering system:

- (a) The machine shall be equipped with four non-resettable mechanical meters housed in a readily accessible locked machine area;
- (b) The mechanical meters shall be manufactured in such a way as to prevent access to the internal parts without destroying the meter;
- (c) The mechanical meters shall be hardwired as no quick connects are allowed in the meter wiring system;
- (d) The mechanical meters shall be situated in a left to right or top to bottom configuration according to function and visibly labeled as follows:
  - (1) Coins in (including the equivalent of 4 coins per one dollar bill inserted in the bill acceptor);
  - (2) Credits played;
  - (3) Credits won;
  - (4) Credit paid.
- (e) The machine shall contain electronic metering whereby meters record and display on the video screen a minimum of the following information:
  - (1) Total coins in for mechanism 1;
  - (2) Total coins in for mechanism 2 (if applicable);
  - (3) Total coins in for the bill acceptor (if applicable);
  - (4) Combined total of coins in;
  - (5) Total credits played;
  - (6) Total credits won;
  - (7) Total credits paid.
- (f) The electronic meters shall have the capability to maintain correct totals no less than eight digits in length.
- (g) In the case a device offers the game of video finite pull-tab, the device may not be capable of displaying to the player, operator, location owner, manufacturer or distributor the number of tickets that remain in the deal or the number of winners or losers that have been drawn or still remain in the deal. The manufacturer may signal when a deal or sub-deal is close to exhaustion if regeneration of that deal or sub-deal must be affected by some outside force that is not automatic within the machine.

## **T. SOFTWARE INFORMATION TO BE PROVIDED TO THE COMMISSION.**

A licensed operator shall provide to the Commission information necessary to ensure the machine's software is in compliance with the Charitable Bingo Law and these administrative rules. The information shall include, but not be limited to:

- 1. All technical manuals;
- 2. All schematics, printed wire assembly and hardware block diagrams;
- 3. All microprocessor manuals;
- 4. All source listings, including programmer's comments and flow charts for the game program(s) and printer routine(s);
- 5. Hexadecimal dump(s) for each compiled program;
- 6. Master EPROM's containing compiled game programs and character sets, including those that may reside on the printer interface board;
- 7. Access to a compiler for the programming language used if the division's selected lab is unable to compile the program with the equipment it has available;

8. A written description of the random number generator algorithm;
9. Schedule of proposed payouts, percentages and odds determinations;
10. A complete copy of the programmer's memory map;
11. A description of the methods of all testing criteria, if performed, and the results of the tests of the following:
  - a. Random number generator
  - b. Electromechanical interference
  - c. Radio frequency interference
  - d. FCC standards
  - e. AC line noise
  - f. Static electricity
  - g. Extreme temperature conditions
12. Truth tables for all PALS used; and
13. An operator's manual for each peripheral device utilized.

#### U. MACHINE TESTING.

- Section 1. The Commission may not permit a particular make or model machine until tests prescribed by the Commission confirm the machine complies with all specifications required by the Act and by the rules of the Commission.
- Section 2. The licensee shall furnish at its expense a prototype of the machine for which a permit is sought to a laboratory selected by the Commission for testing.
- Section 3. Any and all modifications made to an approved machine must be submitted to the Commission for approval in advance.
- Section 4. The Commission may require an approved machine to be retested at a laboratory selected by the Commission if a modification has been made since the original test.
- Section 5. The licensee shall pay to the Commission all costs associated with the machine testing, and shall be responsible for any purchase, shipping, or handling charges prior to the machine being permitted by the Commission.
- Section 6. The testing laboratory shall use established uniform testing criteria on each machine tested. Testing includes inspection of the hardware, software, and all information provided to the Commission or the testing laboratory to assure a machine meets all requirements of the Charitable Bingo Law and the rules of the Commission.

#### V. APPROVAL OF MACHINES.

- Section 1. The Commission may conditionally approve and maintain a list of specific models of machines based on its finding that the machines conform to the specifications provided in the rules of the Commission.
1. Final approval of each machine is required for a permit stamp even if a

machine has been conditionally approved;

2. Conditional or final approval may be withdrawn by the Commission upon finding that a machine does not conform to specifications and testing standards provided in the rules of the Commission.

Section 2. Machines which fail to conform with the specifications provided in the rules of the Commission may be conditionally approved and permitted provided that:

1. The manufacturer, distributor or owner provides an itemization of the nonconforming criteria and the machine complies with all other technical specifications provided in the rules of the Commission;

2. The manufacturer, distributor or owner provides a written plan specifying the time period required for modifications to conform to the specifications;

3. The itemization and plan submitted by the manufacturer, distributor or owner is accepted in writing by the Commission.

## W. MACHINE REPAIR.

Section 1. After the Commission approves the software and logic board of a machine, it will use the prescribed security seal process to guard against any unauthorized tampering or changes.

Section 2. The Commission may require and provide an identification sticker to be attached to the logic board and the mechanical meters to verify the parts are assigned to a specific permitted machine.

Section 3. No security seal shall be broken except when authorized by the Commission and only in the presence of Commission personnel.

Section 4. Any repair or replacement of a machine's mechanical meter or logic board which requires the breaking of the security seal shall be reported to the Commission. An agent must be present before the seal is broken. The Commission will have a representative present during the breaking of the security seal. At that time, readings of the machine's electronic and mechanical meters must be recorded by an agent of the Commission and the initial readings of the electronic and mechanical meters shall be recorded by an agent of the Commission before the machine is again placed in operation.

Section 5. Agents of the Commission may be given access to the machine to reseal the meters and verify their proper operation before the machine can be placed in operation.

Section 6. To assure the integrity, security, and monitoring of machines in service, a permitted machine or any portion thereof may not be substituted or replaced until the